



UNITED STATES
ENVIRONMENTAL PROTECTION
AGENCY - REGION I

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL
PROTECTION



RDMS DocID

107270

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

December 2, 2008

Mr. Edward Lapidus
Wampus Milford Associates, LLP
JMG Milford Realty, LLC
9 Hopes Farm Lane
Bedford, NY 10506

Wampus Milford
CTD 001453232
R-9
#107270

RE: Response to March 6, 2008 "Site Investigation and Remediation Status Report"
for the Wampus Milford Associates Site, Milford, Connecticut

Dear Mr. Lapidus:

Thank you for submitting the "Site Investigation and Remediation Status Report" dated March 6, 2008 (Site Report). The Site Report provides an update in the status of the investigation and remediation of the Wampus Milford Associates (WMA) site located at 80 Wampus Lane, Milford, CT (WMA Site) by WMA.

Figure 2 of the Site Report shows that the WMA Site consists of approximately 24.8 acres of land and has been divided into 3 parcels. Based on the Site Report and other documents submitted to CT DEP under the Connecticut Property Transfer Act, referenced below, the WMA Site consists of the following:

- Lot 1, which comprises 9.24 acres of land, contains a former manufacturing facility and is now owned by JMG Milford Realty LLC;
- Lot 2, which comprises approximately 13 acres of land, consists mainly of wooded areas and wetlands, and is owned by WMA; and
- a 2.472-acre parcel located to the northeast of Lot 2, which is labeled "to be deeded to the City of Milford" on Figure 2 of the Site Report.

This letter is issued to you by the United States Environmental Protection Agency (EPA) pursuant to Section 3013 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6934, and by the Connecticut Department of Environmental Protection (CT DEP) pursuant to the Connecticut Property Transfer Act, C.G.S. § 22a-134a-e (CPTA), in response to your submission of the Site Report to CT DEP. In this letter, the term "WMA Site" is used to refer to the three foregoing parcels of land, as well as any off-site areas impacted by releases of hazardous waste and hazardous constituents from the WMA Site. In accordance with RCRA and the CPTA, RCRA Corrective Action requirements and CPTA requirements apply to the entire WMA Site. According to the Form III documents and Environmental Condition Assessment Forms (ECAFs) submitted to CT DEP under the CPTA for the WMA Site, WMA is the certifying party involved in the following three transfers of the WMA Site or portions thereof:

1. December 28, 1999 conveyance of the WMA Site by Framatome Connectors, USA to WMA;
2. January 26, 2006 conveyance of the WMA Site by five members of WMA to a single member, Mr. Edward Lapidus; and
3. May 11, 2006 conveyance of a portion of the WMA Site, described as Lot 1 in the Site Report, by WMA to JMG Milford Realty LLC.

Based on WMA having been the certifying party under the CPTA for the above transfers, WMA is the party responsible for investigation and remediation of the entire WMA Site.

The purpose of this letter is to ensure that the goals of the state program under the CPTA and the federal Corrective Action program under RCRA are met at the WMA Site. We are therefore providing you with the following with respect to our review of the Site Report:

Section I: CT DEP and EPA comments on the Site Report; and

Section II: A request for a schedule for all additional investigation needed to characterize the nature and extent of hazardous waste or hazardous constituent releases at or from the WMA Site to meet RCRA Corrective Action and CPTA requirements. As noted below, previous schedules submitted since the beginning of 2006 pertained only to Lot 1 and are no longer current.

SECTION I. EPA Comments on March 6, 2008 Site Report

The level of investigation reported in the Site Report appears relatively comprehensive and the report seems fairly complete, but only with respect to Lot 1. Specific gaps are noted below:

General Comments:

1. In several of the areas of concern (AOCs), contaminant concentrations were detected in excess of the Connecticut Remediation Standard Regulations (CT RSRs) Residential Direct Exposure Criteria (RDEC) default criteria. With respect to these and any other CT RSR criteria exceedances, please provide the intended approach for CT RSR compliance.
2. Soil vapor data in the report was compared to the promulgated CT RSR Soil Vapor Volatilization Criteria (SVVC). CT DEP recommends use of the 2003 proposed SVVC, as those criteria reflect a more up to date understanding of the vapor intrusion pathway and the toxicity of certain constituents. CT DEP expects the 2003 SVVC to be promulgated with other revisions to the CT RSRs. If the 2003 SVVC are promulgated, the conclusions of the Site Report will need to be re-evaluated. Sample locations where soil vapor exceeded the 2003 SVVC are noted below.
3. Please provide notice to the building tenants regarding the potential for volatile organic compounds (VOCs) to enter the facility building at unsafe levels via vapor intrusion, as there are several locations where soil vapor concentrations exceeded proposed SVVC.

Specific Comments:

4. Section 3.1.2 states that AOC 2 was fully investigated and successfully remediated in 2002 by WMA's contractor, ERM, and that no other remedial activities are required to satisfy the CT RSRs or RCRA Corrective Action. The August 2002 Annual Summary Report (the 2002 Report) noted that in 1997, 3700 tons of sludge and soil were excavated from this landfill by FCI. However, two soil samples at base of the excavation contained PCE at levels exceeding the CT RSR Industrial/Commercial Direct Exposure Criteria (I/C DEC). The 2002 Report does not cite the depth or location of these samples, so it is unclear whether the PCE-contaminated soil was excavated as part of the soil excavated in 2002. Please provide a figure showing the location of these samples and a table providing sample depths and constituent concentrations detected. Please also specify whether the locations of these samples were included in previous soil removal. If these locations have been remediated, please provide relevant details. If not, please outline WMA's intended approach for compliance with the I/C DEC for this area.

Elevated concentrations of TPH (> I/C DEC) in TB-15, collected in 1998, were found at 4-6 foot depth. However, the 2002 excavation in this area reportedly extended to a depth of 3-4 feet. Samples were not collected at the base of the excavation because it was below the seasonal low water table. In addition, at post excavation sample PE-E, total chromium was detected at 154 mg/kg, in excess of the I/C DEC for hexavalent chromium. No results for hexavalent chromium are presented for this location. Please outline WMA's intended approach for compliance with the CT RSRs at these locations and at any others where remaining soil exceeds CT RSR default criteria.

5. Section 3.1.3 states that for AOC 5, exceedances of applicable I/C DEC will be addressed using an ELUR and that no additional investigation other than groundwater monitoring is recommended. However, the 2002 Report showed that TCE was detected in soil vapor sample SG-16 at a concentration exceeding the March 2003 proposed Industrial/Commercial Soil Vapor Volatilization Criteria (I/C SVVC). According to Figure 6, the soil gas sampling reported in the Site Report did not include sample points in AOC 5. Please outline WMA's intended approach for ensuring VOCs entering the facility building via vapor intrusion do not contribute to unsafe indoor air concentrations and for remediating sources of VOCs in soil vapor.
6. Section 3.1.5 states that for AOC 7 no additional investigation or remedial activities are required. However, the 2002 Report showed that TCE was detected in soil vapor samples SG-10 and SG-10D and PCE was detected in sample SG-10D at concentrations exceeding the March 2003 proposed I/C SVVC. According to Figure 6, the soil gas sampling reported in the Site Report did not include sample points in AOC 7. In addition, ETPH was detected at an AOC-7 catch basin, CB-6, at concentrations exceeding the I/C DEC and GB Pollutant Mobility Criteria (GB PMC). ERM's February 7, 2007 letter to CT DEP stated that this catch basin (CB-6) was remediated in 2001 and material disposed along with the other hazardous waste removed during the excavation of the former waste lines (AOC 3) and landfill material (AOC 2). However, the 2002 Report, which reported the removal of the former waste lines, identified the need for removal of sediment from this catch basin (page 3-33): "Other than the removal of a few cubic feet of sediment from within CB-6, no remedial activities are recommended for this AOC." Please outline WMA's intended approach for demonstrating compliance with the CT RSRs at this AOC, ensuring that VOCs entering the facility building via vapor

intrusion are not contributing to unsafe indoor air concentrations, and remediating sources of VOCs in soil vapor. If the sediment with elevated levels of TPH has been removed from catch basin CB-6, please provide documentation of this work.

7. Section 3.1.9 states that no remedial activities are required to satisfy the CT RSRs at AOC-14. However, the 2002 Report reported PCE detected in excess of the proposed I/C SVVC at SG1. Please outline WMA's intended approach for demonstrating compliance with the CT RSRs at this AOC, ensuring that VOCs entering the facility building via vapor intrusion are not contributing to unsafe indoor air concentrations, and remediating sources of VOCs in soil vapor.
8. Section 3.2.1 states that the MH-7 area was the only portion of AOC 3 not remediated in 2002. However, results of prior investigation show other potential CT RSR exceedances. Sample WLDPE-3 contained TPH at levels exceeding the I/C DEC. In addition, samples WLBPE-12 and WLAPE-2 contained total chromium in excess of the I/C DEC criterion for hexavalent chromium, but results of confirmatory analysis for hexavalent chromium are not presented. Please outline WMA's intended approach for demonstrating compliance with the CT RSRs at these locations.
9. Section 4 of the Site Report describes a proposed groundwater monitoring program for the Site. Generally, DEP and EPA accept the proposed program as a Site-wide evaluation of the compliance status for the groundwater in and around of the various AOCs and for the whole Site. This comprehensive program will include monitoring of up to 30 wells with an analytical parameter list which includes metals, cyanide, VOCs, and SVOCs. The program includes the wells and analytical parameters of the RCRA post-closure groundwater monitoring for the former surface impoundments (lagoons) that was in effect from 1984 to 2002. It is also recommended that WMA analyze groundwater samples for TPH and hexavalent chromium in some wells based on the historic groundwater data and/or soil data.
10. Section 3.2, page 32: The last paragraph of section 3.2 describes the December 2006 soil gas survey performed by ERM. The text states that all results were below the proposed I/C SVVC. However, Table 6 shows trichloroethene results for several locations that exceed the proposed I/C SVVC, including SG-13, -14, -16, -17, -18, -19, -20, -21, -22, -23, -24, -25, -26, -27, -28, -29. Please provide WMA's intended approach for demonstrating compliance with the RSRs, ensuring that VOCs entering the facility building via vapor intrusion are not contributing to unsafe indoor air concentrations, and remediating sources of VOCs in soil vapor.

Please provide the information requested in the above comments to EPA and CT DEP within 60 days of the date of this letter.

SECTION II. Request for Proposed Schedule

The second paragraph of Section 1.1 of the Site Report states incorrectly that the investigation and remediation of environmental issues related to Lot 2 is being conducted by FCI. EPA and FCI entered into a Settlement Agreement and Administrative Order on Consent (Settlement Agreement) focused on remediation of soils and sediments in AOC 1, which is also known as the former drainage swale. However, investigation and remediation of other environmental issues on

Lot 2 was beyond the scope of the Settlement Agreement. Pursuant to the notice filed under the CPTA at the time WMA purchased the Site, responsibility for remediation of the entire property was assumed by the certifying party, i.e., WMA. Accordingly, under the CPTA, investigation and remediation of any other releases of hazardous constituents on Lot 2 remains the responsibility of WMA. Releases of hazardous waste or hazardous constituents on Lot 2 are currently known to have occurred in the following areas:

1. Stubby Plain Brook sediments/bank soils: Results of limited sediment sampling performed in 2005 by ERM (enclosed) show elevated concentrations of hazardous waste and hazardous constituents present in Stubby Plain Brook sediments. While some of these constituents were detected upstream of the WMA Site, sample results show several metals and semi-volatile organic compounds (SVOCs) as well as total petroleum hydrocarbons (TPH) present at higher concentrations adjacent to and downstream of the WMA Site than at upstream locations. In addition, the set of constituents detected at elevated levels matches those used or generated at the WMA Site in the past and those found in the sediments of the drainage swale (AOC 1) prior to remediation.
2. Wood Block Area: Figure 2 of the Site Report shows a previously unreported AOC, the "Wood Block Area." Following receipt of the Site Report, EPA requested additional information on the Wood Block Area AOC from WMA. In response, WMA provided a laboratory report dated January 27, 2005. While the Wood Block Area was apparently sampled in 2005, no information on or data from the area had been provided to EPA prior to the March 6, 2008 Site Report. The 2005 laboratory report included analytical results for one wood block sample and four soil samples. The wood block sample was analyzed for SVOCs and metals. Results showed elevated concentrations of several SVOCs and some metals. Soil sample TP-1 was analyzed for VOCs and metal. The other three soil samples were analyzed for metals only. Apparently, none of the soil samples was analyzed for SVOCs. According to WMA, the Wood Block Area is approximately 75 by 150 feet and contains construction debris from the facility building to a depth of 3-4 feet below ground surface. The debris includes woodblocks, concrete and asphalt. The soil samples were collected from 2 to 3 feet below grade. To begin characterizing the nature and extent of soil contamination at the Wood Block Area, WMA should collect surface and subsurface soil samples and analyze these samples for SVOCs, metals and any other contaminants known or suspected to be present in the debris. Surface soil samples should be collected from 0 to 1 foot below ground surface. Subsurface soil samples should be collected at a range of depth intervals extending to and beyond the maximum depth of debris or visible soil impacts.

EPA and CT DEP requested by letters dated June 13, 2006 and July 20, 2006 and by e-mail from EPA dated April 1, 2008 that WMA provide schedules for investigation of the WMA Site, including Stubby Plain Brook. In response to the July 20, 2006 request, WMA provided a response dated August 2, 2006 stating that due to lack of funds, it would instruct its consultant, ERM, to provide a reduced scope of work. ERM subsequently provided a schedule, dated September 6, 2006, for investigation and remediation of Lot 1. Much of the work planned on the September 6, 2006 schedule for Lot 1 has been completed and the schedule is no longer current. No schedules were provided for the rest of the WMA Site. In addition, WMA failed to respond to EPA's April 1, 2008 schedule request.

Within 60 days of the date of this letter, please provide to EPA and CT DEP a schedule for all additional investigation needed to characterize the nature and extent of hazardous waste or

Edward Lapidus
Wampus Milford Associates, LLP
December 2, 2008

hazardous constituent releases at or from the WMA Site to meet RCRA Corrective Action and CPTA requirements. The schedule must provide, at a minimum, projected dates for the work plan/quality assurance project plan submittal, fieldwork start and completion, and report submittal of investigation of the Stubby Plain Brook, the Wood Block Area, and any other areas of the WMA Site where additional information is needed to achieve RCRA Corrective Action and CPTA requirements. The schedule should also include projected dates for submittal of human health and ecological risk assessment deliverables.

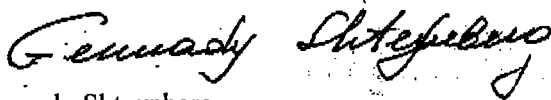
As the certifying party for the WMA Site under the CPTA, WMA is required to submit schedules for the WMA Site and adhere to them in accordance with Connecticut regulations. As noted above, WMA has failed to provide schedules for Lot 2 investigation since 2006. Failure to provide an adequate response to the foregoing comments on the Site Report and a schedule for completing work at the Site that is acceptable to EPA and CT DEP, or failure to adhere to that schedule, may subject you to further enforcement actions under applicable federal and/or state authorities.

Please do not hesitate to call Stephanie Carr of EPA at 617/918-1363 or Gennady Shteynberg of CT DEP at 860/424-3283 if you have any questions on this letter.

Sincerely,



Stephanie Carr
RCRA Facility Manager
Office of Site Remediation and Restoration
U.S. Environmental Protection Agency – Region I
One Congress Street – Suite 1100 (HBT)
Boston, MA 02114-2023



Gennady Shteynberg
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State of Connecticut Department of Environmental Protection
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Enclosures

cc: J. Chow, EPA
A. Katzen, EPA
J. Pfeifer, ERM
D. Ringquist, CT DEP

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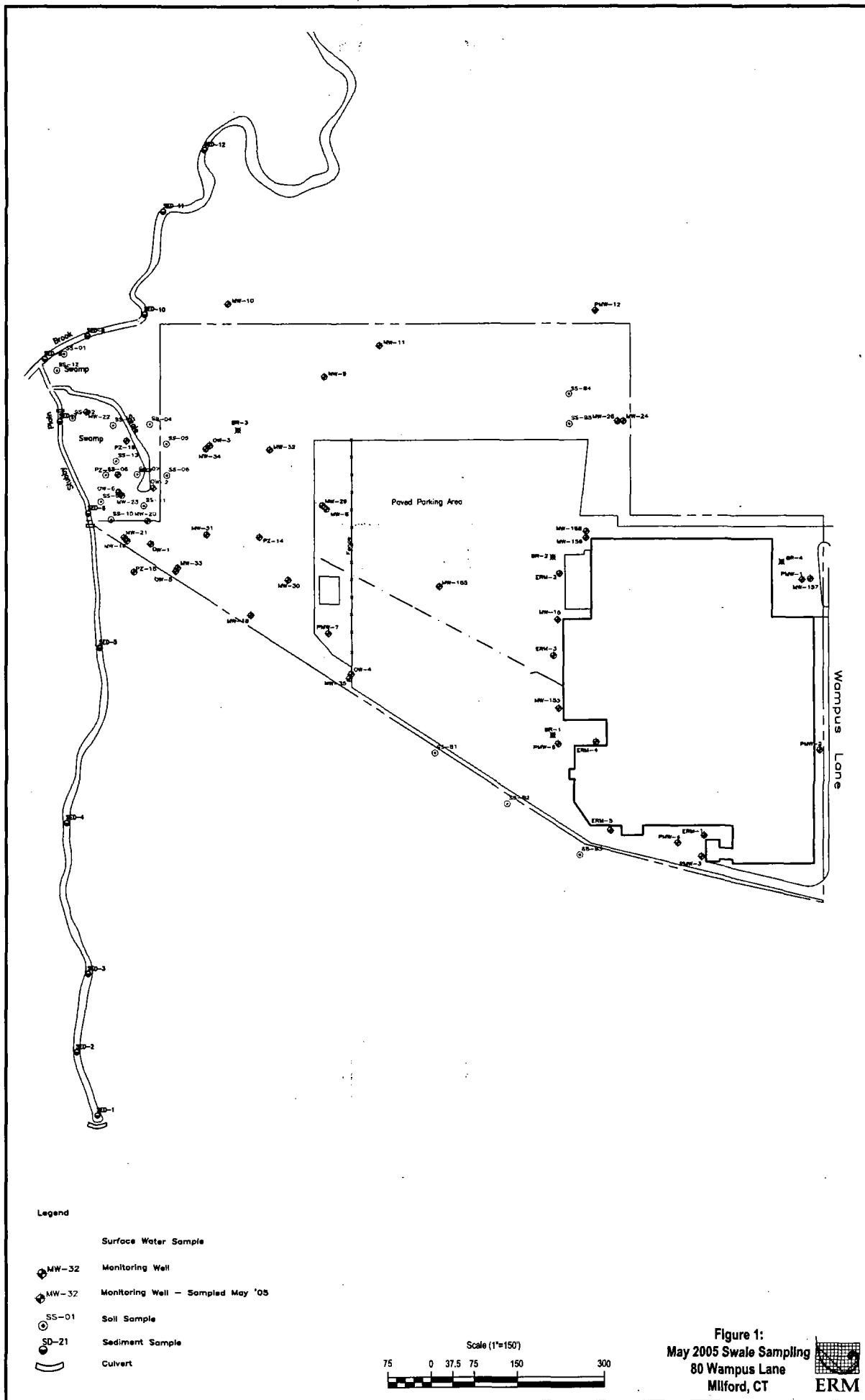


TABLE ?
SEDIMENT ANALYTICAL RESULTS - OILS
80 Wampus Lane
Milford, CT

CONSTITUENT	P/F	UNITS	Direct Exposure Criteria Residential	SED-01 SED-1 5/5/2005 0	SED-02 SED-2 5/5/2005 0	SED-03 SED-3 5/5/2005 0	SED-04 SED-4 5/5/2005 0	SED-05 SED-5 5/5/2005 0	SED-06 SED-6 5/5/2005 0
Gasoline Range Organics (C6-C12)	Total	(mg/kg)		155 U D	106 U D	96.5 U	172 U D	36.4 U	185 U D
Fuel oil no. 2	Total	(mg/kg)		155 U D	106 U D	96.5 U	172 U D	36.4 U	185 U D
Fuel oil no. 4	Total	(mg/kg)		155 U D	106 U D	96.5 U	172 U D	36.4 U	185 U D
Fuel oil no. 6	Total	(mg/kg)		155 U D	106 U D	96.5 U	172 U D	36.4 U	185 U D
Motor Oil	Total	(mg/kg)		155 U D	106 U D	96.5 U	172 U D	36.4 U	185 U D
Aviation Fuel	Total	(mg/kg)		155 U D	106 U D	96.5 U	172 U D	36.4 U	185 U D
Other Oil	Total	(mg/kg)		155 U D	106 U D	96.5 U	172 U D	36.4 U	185 U D
Total Purgeable Hydrocarbons	Total	(mg/kg)	500	392 D	312 D	343	[701] D	70.6	[984] D
C9-C36 Aliphatic Hydrocarbons	Total	(mg/kg)		392 D	312 D	343	701 D	70.6	984 D

TABLE ?
 SEDIMENT ANALYTICAL RESULTS - OILS
 80 Wampus Lane
 Milford, CT

CONSTITUENT	P/F	UNITS	Direct Exposure Criteria Residential	SED-07 SED-7 5/5/2005 0	SED-08 SED-8 5/5/2005 0	SED-09 SED-9 5/5/2005 0	SED-10 SED-10 5/5/2005 0	SED-11 SED-11 5/5/2005 0	SED-12 SED-12 5/5/2005 0
Gasoline Range Organics (C6-C12)	Total	(mg/kg)		208 U D	163 U D	52.8 U D	131 U D	172 U D	181 U D
Fuel oil no. 2	Total	(mg/kg)		208 U D	163 U D	52.8 U D	131 U D	172 U D	181 U D
Fuel oil no. 4	Total	(mg/kg)		208 U D	163 U D	52.8 U D	131 U D	172 U D	181 U D
Fuel oil no. 6	Total	(mg/kg)		208 U D	163 U D	52.8 U D	131 U D	172 U D	181 U D
Motor Oil	Total	(mg/kg)		208 U D	163 U D	52.8 U D	131 U D	172 U D	181 U D
Aviation Fuel	Total	(mg/kg)		208 U D	163 U D	52.8 U D	131 U D	172 U D	181 U D
Other Oil	Total	(mg/kg)		208 U D	163 U D	52.8 U D	131 U D	172 U D	181 U D
Total Purgeable Hydrocarbons	Total	(mg/kg)	500	[47600] D	[1430] D	278 D	[3480] D	[2210] D	[1710] D
C9-C36 Aliphatic Hydrocarbons	Total	(mg/kg)		47600 D	1430 D	278 D	3480 D	2210 D	1710 D

TABLE ?
 SEDIMENT ANALYTICAL RESULTS - METALS
 80 Wampus Lane
 Milford, CT

CONSTITUENT	UNITS	Direct Exposure Criteria Residential	SED-01 SED-1 5/5/2005 (0-0.5)	SED-02 SED-2 5/5/2005 (0-0.5)	SED-03 SED-3 5/5/2005 (0-0.5)	SED-04 SED-4 5/5/2005 (0-0.5)	SED-05 SED-5 5/5/2005 (0-0.5)	SED-06 SED-6 5/5/2005 (0-0.5)	SED-07 SED-7 5/5/2005 (0-0.5)	SED-08 SED-8 5/5/2005 (0-0.5)
Silver	(mg/kg)	340	5.48 U	3.30 U	5.59 U	5.38 U	2.50 U	7.06	14.6	52.3
Aluminum	(mg/kg)		27200	10100	14900	32100	9050	26400	24800	26400
Beryllium	(mg/kg)	2	1.26	0.661	1.12 U	1.43	0.501 U	1.37	1.6	[2.67]
Cadmium	(mg/kg)	34	3.26	0.843	1.40 U	5.08	0.663	17.7	[39.6]	[90.7]
Chromium	(mg/kg)		50.8	23.3	29.4	66.3	12.4	78.2	121	298
Copper	(mg/kg)	2500	221	244	28.4	198	65.6	289	919	2130
Nickel	(mg/kg)	1400	35.7	13.9	18.7	45.5	9.41	46.4	71.1	79.5
Lead	(mg/kg)	400	256	97.2	69.8	[644]	66.9	328	324	[724]
Tin	(mg/kg)		4.36	5.14	3.8	5.68	2.63	50.8	293	961
Zinc	(mg/kg)	20000	392	126	50	464	90	401	557	486
Hex. Chromium	(mg/kg)	100	[1440] U D	[875] U D	[1470] U D	[1280] U D	[683] U D	[1660] U D	[1660] U D	[1280] U D

TABLE ?
SEDIMENT ANALYTICAL RESULTS - METALS
80 Wampus Lane
Milford, CT

CONSTITUENT	UNITS	Direct Exposure Criteria Residential	SED-09 SED-9 5/5/2005 (0-0.5)	SED-10 SED-10 5/5/2005 (0-0.5)	SED-11 SED-11 5/5/2005 (0-0.5)	SED-12 SED-12 5/5/2005 (0-0.5)
Silver	(mg/kg)	340	2.97	127	21.5	52
Aluminum	(mg/kg)		5210	22300	18600	16300
Beryllium	(mg/kg)	2	0.481	[12.1]	1.74	[7.69]
Cadmium	(mg/kg)	34	33.9	[1020]	[69.4]	[313]
Chromium	(mg/kg)		27.3	793	157	534
Copper	(mg/kg)	2500	129	[5760]	1180	[3320]
Nickel	(mg/kg)	1400	28.5	403	60.9	166
Lead	(mg/kg)	400	29.6	[1550]	273	[563]
Tin	(mg/kg)		30.0 U	3970	467	1380
Zinc	(mg/kg)	20000	90.1	1500	411	792
Hex. Chromium	(mg/kg)	100	[2840] U D	[1170] U D	[1400] U D	[1540] U D

TABLE ?
SEDIMENT ANALYTICAL DATA - PAHs & TPH
80 Wampus Lane
Milford, CT

CONSTITUENT	UNITS	Direct Exposure Criteria Residential	SED-01 SED-1 5/5/2005 (0-0.5)	SED-02 SED-2 5/5/2005 (0-0.5)	SED-03 SED-3 5/5/2005 (0-0.5)	SED-04 SED-4 5/5/2005 (0-0.5)	SED-05 SED-5 5/5/2005 (0-0.5)	SED-06 SED-6 5/5/2005 (0-0.5)	SED-07 SED-7 5/5/2005 (0-0.5)
Acenaphthene	(ug/kg)		1920 U	1320 U	2400 U	2140 U	904 U	2300 U	2590 U
Acenaphthylene	(ug/kg)	1000000	1920 U	1320 U	2400 U	2140 U	904 U	2300 U	2590 U
Anthracene	(ug/kg)	1000000	1920 U	1320 U	2400 U	2140 U	904 U	2300 U	2590 U
1,2-Benzanthracene	(ug/kg)	1000	[2630]	[1320] U	[2400] U	[2140] U	904 U	[4600]	[6980]
3,4-Benzopyrene	(ug/kg)	1000	[2700]	[1320] U	[2400] U	[2830]	904 U	[4920]	[8090]
Benz(a)acephenanthrylene	(ug/kg)	1000	[2650]	[1320] U	[2400] U	[3240]	904 U	[5660]	[8310]
Benzo(g,h,i)perylene	(ug/kg)		1920 U	1320 U	2400 U	2140 U	904 U	2630	5430
Benzo(k)fluoranthene	(ug/kg)	8400	2560	1320 U	2400 U	3180	904 U	5660	8030
Chrysene	(ug/kg)		2990	1320 U	2400 U	2970	904 U	5730	10000
1,2:5,6-Dibenzanthracene	(ug/kg)		1920 U	1320 U	2400 U	2140 U	904 U	2300 U	2590 U
Fluoranthene	(ug/kg)	1000000	5900	1550	3040	4840	904 U	9360	12100
Fluorene	(ug/kg)	1000000	1920 U	1320 U	2400 U	2140 U	904 U	2300 U	2590 U
1,10-(1,2-Phenylene)pyrene	(ug/kg)		1920 U	1320 U	2400 U	2140 U	904 U	2400	4970
1-Methylnaphthalene	(ug/kg)		1920 U	1320 U	2400 U	2140 U	904 U	2300 U	2590 U
2-Methylnaphthalene	(ug/kg)		1920 U	1320 U	2400 U	2140 U	904 U	2300 U	2590 U
Naphthalene	(ug/kg)	1000000	1920 U	1320 U	2400 U	2140 U	904 U	2300 U	2590 U
Phenanthrene	(ug/kg)	1000000	3210	1320 U	2400 U	2400	904 U	4950	8860
Pyrene	(ug/kg)	1000000	6240	1890	3360	6740	904 U	11800	15200
Total Hydrocarbons	(mg/kg)	500	392 D	312 D	343	[701] D	70.6	[984] D	[47600] D

TABLE ?
SEDIMENT ANALYTICAL DATA - PAHs & TPH
80 Wampus Lane
Milford, CT

CONSTITUENT	UNITS	Direct Exposure Criteria Residential	SED-08 SED-8 5/5/2005 (0-0.5)	SED-09 SED-9 5/5/2005 (0-0.5)	SED-10 SED-10 5/5/2005 (0-0.5)	SED-11 SED-11 5/5/2005 (0-0.5)	SED-12 SED-12 5/5/2005 (0-0.5)
Acenaphthene	(ug/kg)		2020 U	3760 U	1620 U	2130 U	2250 U
Acenaphthylene	(ug/kg)	1000000	2020 U	3760 U	1620 U	2130 U	2250 U
Anthracene	(ug/kg)	1000000	2020 U	3760 U	1620 U	2130 U	2250 U
1,2-Benzanthracene	(ug/kg)	1000	[4220]	[3760] U	[2040]	[3590]	[2250] U
3,4-Benzopyrene	(ug/kg)	1000	[5070]	[3990]	[2880]	[4750]	[2590]
Benz(a)acephenanthrylene	(ug/kg)	1000	[6020]	[4100]	[3440]	[5310]	[2770]
Benzo(g,h,i)perylene	(ug/kg)		3180	3760 U	2010	3010	2250 U
Benzo(k)fluoranthene	(ug/kg)	8400	4540	3910	2990	5340	2960
Chrysene	(ug/kg)		6070	4470	3400	5470	2820
1,2:5,6-Dibenzanthracene	(ug/kg)		2020 U	3760 U	1620 U	2130 U	2250 U
Fluoranthene	(ug/kg)	1000000	8640	7750	4910	7860	4600
Fluorene	(ug/kg)	1000000	2020 U	3760 U	1620 U	2130 U	2250 U
1,10-(1,2-Phenylene)pyrene	(ug/kg)		2760	3760 U	1810	2900	2250 U
1-Methylnaphthalene	(ug/kg)		2020 U	3760 U	1620 U	2130 U	2250 U
2-Methylnaphthalene	(ug/kg)		2020 U	3760 U	1620 U	2130 U	2250 U
Naphthalene	(ug/kg)	1000000	2020 U	3760 U	1620 U	2130 U	2250 U
Phenanthrene	(ug/kg)	1000000	6660	4240	2200	4440	2250 U
Pyrene	(ug/kg)	1000000	10600	7910	6530	10300	5730
Total Hydrocarbons	(mg/kg)	500	[1430] D	278 D	[3480] D	[2210] D	[1710] D

TABLE ?
SEDIMENT ANALYTICAL DATA - VOCs
80 Wampus Lane - Milford, CT

CONSTITUENT	UNITS	Direct Exposure Criteria Residential	SED-01 SED-1 5/5/2005 (0-0.5)	SED-02 SED-2 5/5/2005 (0-0.5)	SED-03 SED-3 5/5/2005 (0-0.5)	SED-04 SED-4 5/5/2005 (0-0.5)	SED-05 SED-5 5/5/2005 (0-0.5)	SED-06 SED-6 5/5/2005 (0-0.5)	SED-07 SED-7 5/5/2005 (0-0.5)
1,1,1,2-Tetrachloroethane	(ug/kg)	24000	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
1,1,1-Trichloroethane	(ug/kg)	500000	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
1,1,2,2-Tetrachloroethane	(ug/kg)	3100	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
1,1,2-Trichloroethane	(ug/kg)	11000	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
1,1-Dichloroethane	(ug/kg)	500000	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
1,1-Dichloroethene	(ug/kg)	1000	34.9 U	12.9 U	31.3 U	[1150] U D	570 U D	458 U D	22.1 U
1,1-Dichloropropene	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
1,2,3-Trichlorobenzene	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
1,2,3-Trichloropropane	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
1,2,4-Trichlorobenzene	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
1,2-Dichloroethane	(ug/kg)	6700	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
1,2-Dichloropropane	(ug/kg)	9000	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
1,3-Dichloropropane	(ug/kg)	3400	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
1,4-Dioxane	(ug/kg)		698 U	258 U	626 U	23000 U D	11400 U D	9150 U D	443 U
2,2-Dichloropropane	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
2-Hexanone	(ug/kg)		349 U	129 U	313 U	11500 U D	5700 U D	4580 U D	221 U
Acetone	(ug/kg)	500000	1260	583	2240	23000 U D	11400 U D	9150 U D	876
Acrylonitrile	(ug/kg)	1100	34.9 U	12.9 U	31.3 U	[1150] U D	570 U D	458 U D	22.1 U
Benzene	(ug/kg)	21000	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
Benzene, 1,2,4-trimethyl	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	92.1
Benzene, 1,3,5-trimethyl-	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
Benzene, 1-methylethyl-	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
Bromobenzene	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
Bromodichloromethane	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
Bromoform	(ug/kg)	78000	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
Carbon disulfide	(ug/kg)		175 U	64.4 U	156 U	5760 U D	2850 U D	2290 U D	111 U
Carbon tetrachloride	(ug/kg)	4700	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
Chlorobenzene	(ug/kg)	500000	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
Chlorobromomethane	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
Chloroethane	(ug/kg)		69.8 U	25.8 U	62.6 U	2300 U D	1140 U D	915 U D	44.3 U
Chloroform	(ug/kg)	100000	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U

TABLE ?
SEDIMENT ANALYTICAL DATA - VOCs
80 Wampus Lane - Milford, CT

CONSTITUENT	UNITS	Direct Exposure Criteria Residential	SED-01 SED-1 5/5/2005 (0-0.5)	SED-02 SED-2 5/5/2005 (0-0.5)	SED-03 SED-3 5/5/2005 (0-0.5)	SED-04 SED-4 5/5/2005 (0-0.5)	SED-05 SED-5 5/5/2005 (0-0.5)	SED-06 SED-6 5/5/2005 (0-0.5)	SED-07 SED-7 5/5/2005 (0-0.5)
cis-1,2-Dichloroethene	(ug/kg)	500000	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
cis-1,3-Dichloropropene	(ug/kg)	3400	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
DBCP	(ug/kg)		69.8 U	25.8 U	62.6 U	2300 U D	1140 U D	915 U D	44.3 U
Dibromochloromethane	(ug/kg)	7300	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
Dichlorodifluoromethane	(ug/kg)		69.8 U	25.8 U	62.6 U	2300 U D	1140 U D	915 U D	44.3 U
Diethyl ether	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
EDB	(ug/kg)	7	[34.9] U	[12.9] U	[31.3] U	[1150] U D	[570] U D	[458] U D	[22.1] U
Ethylbenzene	(ug/kg)	500000	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
Hexachlorobutadiene	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
Isopropyl Ether	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
m+p-Xylene	(ug/kg)		69.8 U	25.8 U	62.6 U	2300 U D	1140 U D	915 U D	44.3 U
m-Dichlorobenzene	(ug/kg)	500000	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
Methyl bromide	(ug/kg)		69.8 U	25.8 U	62.6 U	2300 U D	1140 U D	915 U D	44.3 U
Methyl chloride	(ug/kg)		69.8 U	25.8 U	62.6 U	2300 U D	1140 U D	915 U D	44.3 U
Methyl ethyl ketone	(ug/kg)	500000	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
Methyl isobutylketone (MIBK)	(ug/kg)	500000	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
Methylene bromide	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
Methylene chloride	(ug/kg)	82000	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
Methyltert-butylether	(ug/kg)	500000	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
n-Butylbenzene	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	23.6
n-Propylbenzene	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
o-Chlorotoluene	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
o-Dichlorobenzene	(ug/kg)	500000	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
o-Xylene	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
p-Chlorotoluene	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
p-Cymene	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
p-Dichlorobenzene	(ug/kg)	26000	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
sec-Butylbenzene	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
Styrene	(ug/kg)	500000	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
tert-Amyl methyl ether	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
tert-Buthyl ethyl ether	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U

TABLE ?
SEDIMENT ANALYTICAL DATA - VOCs
80 Wampus Lane - Milford, CT

CONSTITUENT	UNITS	Direct Exposure Criteria Residential	SED-01 SED-1 5/5/2005 (0-0.5)	SED-02 SED-2 5/5/2005 (0-0.5)	SED-03 SED-3 5/5/2005 (0-0.5)	SED-04 SED-4 5/5/2005 (0-0.5)	SED-05 SED-5 5/5/2005 (0-0.5)	SED-06 SED-6 5/5/2005 (0-0.5)	SED-07 SED-7 5/5/2005 (0-0.5)
tert-Butylbenzene	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
Tertiary ButylAlcohol	(ug/kg)		349 U	129 U	313 U	11500 U D	5700 U D	4580 U D	221 U
Tetrachloroethene	(ug/kg)	12000	34.9 U	12.9 U	200	1150 U D	570 U D	458 U D	22.1 U
Tetrahydrofuran	(ug/kg)		349 U	129 U	313 U	11500 U D	5700 U D	4580 U D	221 U
Toluene	(ug/kg)	500000	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
trans-1,2-Dichloroethene	(ug/kg)	500000	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
trans-1,3-Dichloropropene	(ug/kg)	3400	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
Trichloroethene	(ug/kg)	56000	34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
Trichlorofluoromethane	(ug/kg)		34.9 U	12.9 U	31.3 U	1150 U D	570 U D	458 U D	22.1 U
Vinyl chloride	(ug/kg)	320	34.9 U	12.9 U	31.3 U	[1150] U D	[570] U D	[458] U D	22.1 U

TABLE ?
SEDIMENT ANALYTICAL DATA - VOCs
80 Wampus Lane - Milford, CT

CONSTITUENT	UNITS	Direct Exposure Criteria Residential	SED-08 SED-8 5/5/2005 (0-0.5)	SED-09 SED-9 5/5/2005 (0-0.5)	SED-10 SED-10 5/5/2005 (0-0.5)	SED-11 SED-11 5/5/2005 (0-0.5)	SED-12 SED-12 5/5/2005 (0-0.5)
1,1,1,2-Tetrachloroethane	(ug/kg)	24000	269 U D	149 U D	17.9 U	34.4 U	400 U D
1,1,1-Trichloroethane	(ug/kg)	500000	269 U D	149 U D	17.9 U	34.4 U	400 U D
1,1,2,2-Tetrachloroethane	(ug/kg)	3100	269 U D	149 U D	17.9 U	34.4 U	400 U D
1,1,2-Trichloroethane	(ug/kg)	11000	269 U D	149 U D	17.9 U	34.4 U	400 U D
1,1-Dichloroethane	(ug/kg)	500000	269 U D	149 U D	17.9 U	34.4 U	400 U D
1,1-Dichloroethene	(ug/kg)	1000	269 U D	149 U D	17.9 U	34.4 U	400 U D
1,1-Dichloropropene	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
1,2,3-Trichlorobenzene	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
1,2,3-Trichloropropane	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
1,2,4-Trichlorobenzene	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
1,2-Dichloroethane	(ug/kg)	6700	269 U D	149 U D	17.9 U	34.4 U	400 U D
1,2-Dichloropropane	(ug/kg)	9000	269 U D	149 U D	17.9 U	34.4 U	400 U D
1,3-Dichloropropane	(ug/kg)	3400	269 U D	149 U D	17.9 U	34.4 U	400 U D
1,4-Dioxane	(ug/kg)		5370 U D	2980 U D	357 U	689 U	8000 U D
2,2-Dichloropropane	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
2-Hexanone	(ug/kg)		2690 U D	1490 U D	179 U	344 U	4000 U D
Acetone	(ug/kg)	500000	5370 U D	2980 U D	2020	1190	8000 U D
Acrylonitrile	(ug/kg)	1100	269 U D	149 U D	17.9 U	34.4 U	400 U D
Benzene	(ug/kg)	21000	269 U D	149 U D	17.9 U	34.4 U	400 U D
Benzene, 1,2,4-trimethyl	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
Benzene, 1,3,5-trimethyl-	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
Benzene, 1-methylethyl-	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
Bromobenzene	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
Bromodichloromethane	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
Bromoform	(ug/kg)	78000	269 U D	149 U D	17.9 U	34.4 U	400 U D
Carbon disulfide	(ug/kg)		1340 U D	745 U D	89.3 U	172 U	2000 U D
Carbon tetrachloride	(ug/kg)	4700	269 U D	149 U D	17.9 U	34.4 U	400 U D
Chlorobenzene	(ug/kg)	500000	269 U D	149 U D	17.9 U	34.4 U	400 U D
Chlorobromomethane	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
Chloroethane	(ug/kg)		537 U D	298 U D	35.7 U	68.9 U	800 U D
Chloroform	(ug/kg)	100000	269 U D	149 U D	17.9 U	34.4 U	400 U D

TABLE ?
SEDIMENT ANALYTICAL DATA - VOCs
80 Wampus Lane - Milford, CT

CONSTITUENT	UNITS	Direct Exposure Criteria Residential	SED-08 SED-8 5/5/2005 (0-0.5)	SED-09 SED-9 5/5/2005 (0-0.5)	SED-10 SED-10 5/5/2005 (0-0.5)	SED-11 SED-11 5/5/2005 (0-0.5)	SED-12 SED-12 5/5/2005 (0-0.5)
cis-1,2-Dichloroethene	(ug/kg)	500000	269 U D	149 U D	17.9 U	34.4 U	400 U D
cis-1,3-Dichloropropene	(ug/kg)	3400	269 U D	149 U D	17.9 U	34.4 U	400 U D
DBCP	(ug/kg)		537 U D	298 U D	35.7 U	68.9 U	800 U D
Dibromochloromethane	(ug/kg)	7300	269 U D	149 U D	17.9 U	34.4 U	400 U D
Dichlorodifluoromethane	(ug/kg)		537 U D	298 U D	35.7 U	68.9 U	800 U D
Diethyl ether	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
EDB	(ug/kg)	7	[269] U D	[149] U D	[17.9] U	[34.4] U	[400] U D
Ethylbenzene	(ug/kg)	500000	269 U D	149 U D	17.9 U	34.4 U	400 U D
Hexachlorobutadiene	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
Isopropyl Ether	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
m+p-Xylene	(ug/kg)		537 U D	298 U D	35.7 U	68.9 U	800 U D
m-Dichlorobenzene	(ug/kg)	500000	269 U D	149 U D	17.9 U	34.4 U	400 U D
Methyl bromide	(ug/kg)		537 U D	298 U D	35.7 U	68.9 U	800 U D
Methyl chloride	(ug/kg)		537 U D	298 U D	35.7 U	68.9 U	800 U D
Methyl ethyl ketone	(ug/kg)	500000	2690 U D	1490 U D	179 U	344 U	4000 U D
Methyl isobutylketone (MIBK)	(ug/kg)	500000	2690 U D	1490 U D	179 U	344 U	4000 U D
Methylene bromide	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
Methylene chloride	(ug/kg)	82000	2690 U D	1490 U D	179 U	344 U	4000 U D
Methyltert-butylether	(ug/kg)	500000	269 U D	149 U D	17.9 U	34.4 U	400 U D
n-Butylbenzene	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
n-Propylbenzene	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
o-Chlorotoluene	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
o-Dichlorobenzene	(ug/kg)	500000	269 U D	149 U D	17.9 U	34.4 U	400 U D
o-Xylene	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
p-Chlorotoluene	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
p-Cymene	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
p-Dichlorobenzene	(ug/kg)	26000	269 U D	149 U D	17.9 U	34.4 U	400 U D
sec-Butylbenzene	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
Styrene	(ug/kg)	500000	269 U D	149 U D	17.9 U	34.4 U	400 U D
tert-Amyl methyl ether	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
tert-Buthyl ethyl ether	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D

TABLE ?
SEDIMENT ANALYTICAL DATA - VOCs
80 Wampus Lane - Milford, CT

CONSTITUENT	UNITS	Direct Exposure Criteria Residential	SED-08 SED-8 5/5/2005 (0-0.5)	SED-09 SED-9 5/5/2005 (0-0.5)	SED-10 SED-10 5/5/2005 (0-0.5)	SED-11 SED-11 5/5/2005 (0-0.5)	SED-12 SED-12 5/5/2005 (0-0.5)
tert-Butylbenzene	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
Tertiary Butyl Alcohol	(ug/kg)		2690 U D	1490 U D	179 U	344 U	4000 U D
Tetrachloroethene	(ug/kg)	12000	269 U D	149 U D	17.9 U	34.4 U	400 U D
Tetrahydrofuran	(ug/kg)		2690 U D	1490 U D	179 U	344 U	4000 U D
Toluene	(ug/kg)	500000	269 U D	149 U D	17.9 U	34.4 U	400 U D
trans-1,2-Dichloroethene	(ug/kg)	500000	269 U D	149 U D	17.9 U	34.4 U	400 U D
trans-1,3-Dichloropropene	(ug/kg)	3400	269 U D	149 U D	17.9 U	34.4 U	400 U D
Trichloroethene	(ug/kg)	56000	269 U D	149 U D	17.9 U	34.4 U	400 U D
Trichlorofluoromethane	(ug/kg)		269 U D	149 U D	17.9 U	34.4 U	400 U D
Vinyl chloride	(ug/kg)	320	269 U D	149 U D	17.9 U	34.4 U	[400] U D